

William Breck,

Name

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

pil

WILLIAM BRECK, an individual, in ProPer

Plaintiff,

vs.

ROGER DOYLE; JANEEN ISAACSON;  
DAVID CLARK; PATRICK KING; GLENN  
MACHADO; J. THOMAS SUSICH; LAURA  
PETERS; KIMBERLY FARMER; KATHLEEN  
BRECKENRIDGE; CAREN JENKINS; MIKYLAMILLER; MONICA CAFFARATTI; DON  
BEURY; YVETTE CHEVALIER; BRYANHUNT; CAROL HUMMEL; THE STATE BAR  
OF NEVADA; & THE STATE OF NEVADA, ex relTHE SUPREME COURT OF THE STATE  
OF NEVADA; &~~Defendant(s)~~  
UNNAMED DOE DEFENDANTS 1 - 100;  
Defendants.

3:12-cv-00649

CASE NO.

(To be supplied by the Clerk)

CIVIL RIGHTS COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

## A. JURISDICTION

- 1) This complaint alleges that the civil rights of Plaintiff,
- WILLIAM BRECK
- ,
- 
- (Print Plaintiff's name)

who presently resides at ENSENADA, MEXICO, were

violated by the actions of the below named individuals which were directed against

Plaintiff at IN RE STATE BAR GRIEVANCES NG11-1103 & NG11-1378 on the following dates

(institution/city where violation occurred)

IN RE FORMAL HEARINGS ON AUG 28, 2012 &amp; SEPT 17, 2012 - AT STATE BAR OFFICE.

IN RENO, NEVADA & DECISION ENTERED OCTOBER 16 and - 2012

(Count I)

(Count II)

(Count III)

Paid Amt \$ 350 Date 12/11/12Receipt # NV RND-1448 Initials JC

**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

2) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

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3) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

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4) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

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5) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

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6) Defendant \_\_\_\_\_ resides at \_\_\_\_\_,  
 (full name of first defendant) (address if first defendant)  
 and is employed as \_\_\_\_\_. This defendant is sued in his/her  
 (defendant's position and title, if any)  
 \_\_\_\_\_ individual \_\_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
 acting  
 under color of law: \_\_\_\_\_

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7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

28 USC 1331 (FEDERAL QUESTION), 28 USC 1367 (SUPPLEMENTAL JURISDICTION), 28 USC 2201  
(DECLARATORY JUDGMENT); 28 USC 2202 (FURTHER RELIEF); 42 USC 1985 (CONSPIRACY); &

VENUE UNDER 28 USC 1391 IS PROPER IN THIS COURT BECAUSE THE EVENTS OCCURRED IN & THE  
MAJORITY OF THE DEFENDANTS RESIDE IN WASHOE COUNTY OR CLARK COUNTY, NEVADA

#### B. NATURE OF THE CASE

1) Briefly state the background of your case.

On February 1, 2011, Plaintiff Breck, opened the doors of The Public Interest Law Firm, Inc.,  
 (aka "TPI" - a Nevada Non-Profit corporation) for business, and began accepting as clients  
~~homeowners who desired to resist mortgage lenders and servicers who were conducting~~  
~~unlawful, fraudulent and predatory foreclosures under the Nevada non-judicial foreclosure~~  
~~statute.~~

~~17 days later, on February 18, 2011, Bar counsel (David Clark) authorized the opening of an~~  
~~"investigation" into the activities of TPI, which "investigation" was instigated for "political"~~  
~~purposes and not pursuant to the proper exercise of the disciplinary jurisdiction of the State Bar,~~  
~~as subsequently appeared (as alleged in the Complaint) -~~

~~However, in their haste to run "Breck" and "TPI" out of business - Bar Counsel (including David~~  
~~Clark, Janceen Isaacson, Patrick King & Glenn Machado) and their agents, assistants and others~~  
~~who joined with and aided and abetted and assisted as alleged in the Complaint - violated the~~  
~~Civil Rights of Plaintiff Breck to "Due Process" (by failing to follow mandatory procedures - as~~  
~~alleged in the Complaint) and "Equal Protection" (by failing to afford Breck the protections~~  
~~afforded others similarly situated - as alleged in the Complaint) - by defamation & intimidation,~~  
~~by ignoring Breck's constitutional rights - and conducting a mock trial that cannot withstand the~~  
~~scrutiny of this Honorable Court or the general public.~~

#### C. CAUSE OF ACTION

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[illegible]

The following civil rights has been violated: NEGLIGENCE

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[illegible]

**COUNT III**

The following civil rights has been violated: VIOLATION OF OPEN MEETING LAWS

DUE PROCESS & EQUAL PROTECTION - ISSUANCE OF "VOID" DECISION ON OCT 16, 2012

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Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

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COUNT IV - ABUSE OF PROCESS

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COUNT V - INTERFERENCE WITH BUSINESS RELATIONS

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COUNT VI - CONSPIRACY & VIOLATION OF CIVIL RIGHTS UNDER 42 USC 1983

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**D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF.**

- 1) Have you filed other actions in state or federal courts involving the **same or similar facts** as involved in this action? \_\_\_\_ Yes X No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

outline).

- a) Defendants: \_\_\_\_\_
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed , appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?**  
 \_\_\_\_ Yes   X   No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_ frivolous  
 \_\_\_\_ malicious or \_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_

- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? \_\_\_\_ Yes \_\_\_\_ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) \_\_\_\_ disciplinary hearing; (2) \_\_\_\_ state or federal court decision; (3) \_\_\_\_ state or federal law or regulation; (4) \_\_\_\_ parole board decision; or (5) \_\_\_\_ other \_\_\_\_\_.
- If your answer is "Yes", provide the following information. Grievance Number \_\_\_\_\_.
- Date and institution where grievance was filed \_\_\_\_\_.

Response to grievance: THE DECISION ISSUED ON OCTOBER 16, 2012, IS CURRENTLY ON  
APPEAL TO THE SUPREME COURT OF THE STATE OF NEVADA

PLAINTIFF DOES NOT SEEK ANY RELIEF FROM THIS COURT THAT WOULD IN ANY WAY  
INTERFERE WITH THE ADJUDICATION PROCESS IN THE NEVADA SUPREME COURT



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**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following relief:

DECLARATORY & INJUNCTIVE RELIEF TO PREVENT FURTHER ACTION BY THE  
STATE BAR OF NEVADA OR ANY OF ITS AGENTS UNTIL THIS MATTER IS RESOLVED

DECLARATORY JUDGMENT THAT DECISION DATED OCTOBER 16, 2012 IS "VOID"

DAMAGES FOR NEGLIGENCE


DAMAGES FOR ABUSE OF PROCESS

DAMAGES FOR INTERFERENCE WITH BUSINESS RELATIONS

DAMAGES FOR VIOLATION OF CIVIL RIGHTS UNDER 42 USC 1983

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

\_\_\_\_\_  
(Name of Person who prepared or helped  
prepare this complaint if not Plaintiff)

  
\_\_\_\_\_  
(Signature of Plaintiff)

  
\_\_\_\_\_  
(Date)

-----  
(Additional space if needed; identify what is being continued)

\_\_\_\_\_  
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